

Before the  
Federal Communications Commission  
Washington, D.C.

In the Matter of ) RM-10811  
Petition For Rule Making )  
Amendment of Part 97 of FCC Amateur Service )  
Rules to Eliminate Morse Code Testing )

Comments of James P. Miccolis, N2EY

---

Introduction

I am submitting these comments in response to RM-10811, to support the proposed revisions to test requirements in the Amateur Radio Service, and to support the retention of Morse code testing.

I am an electrical engineer with BSEE and MSEE degrees from the University of Pennsylvania and Drexel University, respectively, and am employed full time in the design of control systems for the transportation industry. I am coinventor of US Patent 5,358,202. I am also an amateur radio operator, first licensed by the Commission in 1967, and currently hold an Amateur Extra class license. My interest in amateur radio at an early age led me to pursue a career in electrical engineering.

I fully support the proposed changes proposed in RM-10811, both in the areas of Morse code testing and the written examinations.

Morse Code in Amateur Radio Today

Morse Code is the second most popular mode used by amateurs on the bands below 30 MHz, second only to single sideband voice communication. While its use has essentially disappeared in other radio services, the mode is widely used by radio amateurs for a variety of purposes. Since an amateur radio license authorizes its holder to operate only in the amateur radio bands, it is only logical that amateur license requirements be based primarily on what modes and technologies amateurs actually use on the air, and only secondarily on what modes and technologies other services use. Therefore, it is logical and reasonable to require a basic Morse code test for an amateur radio license with HF/MF privileges. The current 5 word per minute test represents an extremely basic level of a skill widely used in amateur radio.

While no test can absolutely guarantee that a licensee will be a “quality operator”, a review of the Commission’s enforcement actions shows that amateurs cited for rules violations are overwhelmingly using voice modes when the cited violations are committed. By contrast, enforcement actions against amateurs using Morse Code are

extremely rare. The difference cannot be explained by the relative use of the various modes.

### Written Examinations

The current written examination question pools are reasonable and appropriate in their scope and subject material, but the methods by which these tests are administered can be easily improved by the changes suggested in the petition. These changes will not be a burden to anyone who is adequately prepared for the written examinations.

### Conclusion

While the Morse Code test is no longer required by international treaty, it continues to serve a useful purpose in the qualifications for an Amateur Service license. I urge the Commission to enact the changes proposed by petition RM-10811.

Respectfully submitted,

James P. Miccolis